

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUONG HOANG, an individual

Plaintiff,

v.

AMAZON.COM, INC., a Delaware
corporation, and IMDB.COM, INC., a
Delaware corporation,

Defendants.

No. 2:11-CV-01709-JCC

**DECLARATION OF KATHRYN
SHEEHAN IN SUPPORT OF MOTION
FOR PROTECTIVE ORDER QUASHING
NOTICE OF DEPOSITION OF
KATHRYN SHEEHAN**

I, Kathryn Sheehan, hereby declare as follows:

1. I am an Associate General Counsel for Amazon.com, Inc. I have been employed by Amazon.com, Inc. or its affiliates (collectively, "Amazon") since 2003.

2. As Associate General Counsel at Amazon.com., part of my duties include acting as in-counsel for IMDb.com, Inc. ("IMDb.com"), a wholly-owned subsidiary of Amazon.com, to provide legal advice regarding litigation and regulatory compliance, the current state of the law, and legal advice upon request.

3. I have no non-legal responsibilities for either Amazon.com or IMDb.com. I am not a corporate officer for either Amazon.com or IMDb.com and do not provide business advice in my professional capacity.

DECLARATION OF KATHRYN SHEEHAN IN
SUPPORT OF MOTION FOR PROTECTIVE
ORDER (NO. 2:11-CV-01709) – 1

24976-0480/LEGAL24292050.1

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

1 4. Attached as Exhibit A is a true and correct copy of a redacted email string
2
3 between Adrian Garver (a paralegal in the Amazon.com legal department), Giancarlo Cairella
4 (and IMDb.com employee), and me regarding Plaintiff's IMDb.com account. I have examined
5 the unredacted email string as well. The redacted portions of the email consist of: (a) requests
6 for legal advice from Mr. Cairella to me and/or Mr. Garver; and (b) the provision of legal advice
7 from me to Mr. Cairella.
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10 I declare under penalty of perjury that the foregoing is true and correct.
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17 DATED: July 31, 2012

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By.  _____
Kathryn Sheehan

DECLARATION OF KATHRYN SHEEHAN (NO.
2:11-CV-01709) – 2

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CERTIFICATE OF SERVICE

I certify that on August 1, 2012, I electronically filed the foregoing **DECLARATION OF KATHRYN SHEEHAN IN SUPPORT OF MOTION FOR PROTECTIVE ORDER QUASHING NOTICE OF DEPOSITION OF KATHRYN SHEEHAN** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorneys of record

John W Dozier, Jr
Dozier Internet Law
301 Concourse Blvd
West Shore III, Ste 300
Glen Allen, VA 23059

☐ Via hand delivery
☐ Via U.S. Mail, 1st Class, Postage Prepaid
☐ Via Overnight Delivery
☐ Via Facsimile
☐ Via Email
☒ Via ECF

Randall Moeller
Derek Alan Newman
Newman & Newman
1201 Third Avenue, Ste 1600
Seattle, WA 98

☐ Via hand delivery
☐ Via U.S. Mail, 1st Class, Postage Prepaid
☐ Via Overnight Delivery
☐ Via Facsimile
☐ Via Email
☒ Via ECF

I certify under penalty of perjury that the foregoing is true and correct.

DATED this 1st day of August, 2012.

s/ Ashley A. Locke

Charles C. Sipos, WSBA No. 32825
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DECLARATION OF KATHRYN SHEEHAN IN
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